

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOSE MARIA MOYA, ET AL.	§	
	§	
VS.	§	C.A. No. 4:12-CV-03481
	§	JUDGE VANESSA D. GILMORE
CITY OF PASADENA, TEXAS, ET AL.	§	JURY DEMANDED

PLAINTIFFS' INITIAL DISCLOSURES
PURSUANT TO RULE 26(a)(1)

Plaintiffs Jose Maria Moya, Individually and as Administrator of the Estate of Jose Maria Saucedo, Deceased, et al., hereby submit their Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Plaintiffs will supplement these Initial Disclosures as needed and as required by Rule 26(e).

(A)(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses unless the use would be solely for impeachment.

Answer:

Jose Maria Moya
12250 FM 3436 #25
Dickinson, TX 77539
832-588-1815

Plaintiff (Jose Saucedo's son)

Paxton Moya
12250 FM 3436 #25
Dickinson, TX 77539
832-588-1815

Jose Maria Moya's wife

Jose Maria Saucedo, Sr.
3201 S. Pleasantview Dr.
Weslaco, TX 78596
956-647-0409

Plaintiff (Jose Saucedo's father)

Maria Solis
920 Houston St. #1602
Pasadena, TX 77502
281-739-6954

Plaintiff (Jose Saucedo's mother)

Alicia Moya
2213 Rosemead
Pasadena, TX 77506
832-921-3083

Plaintiff (Jose Saucedo's daughter)

Laura Lozano a/n/f Joel Nicholas Saucedo, a Minor
Jonas Angel (deceased son) (2/16/03 to 10/14/04)
3635 S. Shaver #1203
Pasadena, TX 77504
713-429-2994

Plaintiff (Jose Saucedo's minor son and his mother)

Christina M. Scott a/n/f Angel Saucedo, a Minor
2213 Rosemead
Pasadena, TX 77506
713-920-3355

Plaintiff (Jose Saucedo's minor daughter and her mother)

Norma Sanchez
Address unknown

Jose Saucedo's girlfriend

Jessie Adame, M.D.
Pathologist
Autopsy and Pathology Services, P.A.
3007 Woodland Hills Drive, Suite 123
Kingwood, TX 77339

281-359-1953

Performed independent autopsy on Jose Saucedo

Physicians, nurses, medical personnel, employees, and/or
Custodian of Medical Records
Bayshore Medical Center
4000 Spencer Highway
Pasadena, TX 77504
713-359-1545

Facility where Jose Saucedo was taken by police officers

Morna L. Gonsoulin, M.D.
Assistant Medical Examiner
Dwayne A. Wolf, M.D., Ph.D.
Deputy Chief Medical Examiner
Luis A. Sanchez, M.D.
Chief Medical Examiner
Harris County Institute of Forensic Sciences
1885 Old Spanish Trail
Houston, TX 77054
713-796-9292

Performed autopsy on Jose Saucedo

In making these disclosures, Plaintiff does not waive, and expressly reserves his right to assert the attorney-client and/or work product privilege as applicable.

Plaintiff incorporates by reference any additional individuals identified by any other party.

(A)(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Answer:

- A. Autopsy performed by Harris County Medical Examiner
- B. Autopsy performed by Jessie Adame, M.D.
- C. Records from Bayshore Medical Center

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiffs will produce all relevant, non-privileged documents referenced above at the office of undersigned counsel for Plaintiffs at a mutually agreeable time and place.

(A)(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Answer:

Future Lost Earning Capacity	See economist report when produced
Loss of Parental Consortium	\$250,000 per child
Estate Claim for Conscious Pain and Suffering:	\$2,000,000

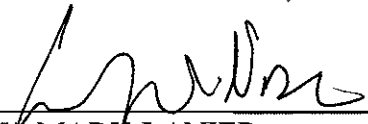
(A)(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Answer: None.

Dated: March 20, 2013

Respectfully submitted,

THE LANIER LAW FIRM, P.C.

By: 

W. MARK LANIER

State Bar No. 11934600

LAWRENCE P. WILSON

State Bar No. 21704100

6810 FM 1960 West

Houston, Texas 770690

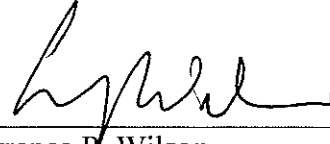
Telephone: (713) 659-5200

Telecopier: (713) 659-2204

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of March, 2013, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for Defendants, and will further serve the foregoing to Defendants.

A handwritten signature in black ink, appearing to read 'L. Wilson', is written over a horizontal line.

Lawrence P. Wilson